I, BARBARA DECELLE, declare:

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I have been a staff member of the Church of Scientology for approximately 6 years. This declaration is offered in support of Plaintiff's application for reconsideration of its application for issuance of a temporary restraining order. I am competent to testify to the facts set forth herein and would so testify if called as a witness.

- Between September 1980 and February 1981, I occupied a 2. position with the Church of Scientology of California, equivalent to a clerical assistant, in support of a staff devoted to studying, modifying and clarifying the corporate structure and relationships of various Scientological organizations and corporations. In this position, my duties were largely secretarial. I wrote letters for my supervisor, transcribed tapes, typed speeches, photocopied documents, performed research and ran errands, and managed the trademark files and applications of the Church. Following my tenure in this position, I occupied a position entitled LRH Public Affairs Property Director from February 1981 until the present. Until June 1981, my office space was immediately adjacent to my prior location.
- I am aware that Defendant Gerald Armstrong has recently filed a supplemental affidavit in a matter styled Tonja Burden v. Church of Scientology of California, et al., Case No. 80-501-Civ-T-K, which is presently pending in the Middle District of Florida, United States District Court. In his affidavit, Mr. Armstrong quotes, at length, from the tape recording of a meeting

between certain staff members of the Church of Scientology and their attorneys.

- 4. The above referenced meeting took place on September 29, 1980. I transcribed the tape recording during a period of approximately one week following the meeting. I thereafter made a copy of the transcription and filed it, along with the original of the transcription, in the working files pertaining to that office. The tape recordings consisted of four separate cassette tapes which I placed in the bottom drawer of my desk.
- 5. At no time did I give either a copy of the transcript nor the original tape cassettes to Gerald Armstrong. After the group that was assigned to study corporate affairs finished their tasks, we packed their files and equipment and shipped it to another location. I did not notice at that time that the subject tape recordings were missing because of the volume of the materials that were packed and shipped.
- 6. To the best of my knowledge and recollection, no one ever listened to the original tape with the exception of myself when I transcribed it, nor do I recall anyone ever requesting to see a copy of the transcript while it was in my possession.
- 7. I am unaware of how Gerald Armstrong came into possession of any of the cassette recordings or of a copy of the transcript that I prepared. This was done entirely without my knowledge or permission.

I have personal knowledge of the facts set forth above, except as to those facts stated on information and belief, and as to those I believe them to be true.

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 Executed this 21 day of August, 1982 at Los August, .California.

I declare under penalty of perjury that the foregoing is true and correct.

MAS GARA DECELLE